

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA**

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D.C. and J.D.M., <i>Plaintiffs,</i>	:	
	:	
v.	:	CIVIL ACTION
	:	NO. NO. 5:21-CV-05070-JMG
	:	
MARTIN NELSON d/b/a LIBERTY	:	JURY TRIAL DEMANDED
RIDGE FARM, LIBERTY RIDGE	:	
FARM, EASTERN PENNSYLVANIA	:	
MENNONITE CHURCH AND RELATED	:	
AREAS, and MENNONITE MESSIANIC	:	
MISSION OF THE EASTERN	:	
PENNSYLVANIA MENNONITE	:	
CHURCH,	:	
	:	
<i>Defendants.</i>	:	

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**JOINT MOTION TO PERMIT PLAINTIFFS TO FILE AN AMENDED COMPLAINT  
AND EXTEND DEFENDANTS' TIME TO ANSWER**

AND NOW, come the Plaintiffs and Defendants, who file this Joint Motion to Permit Plaintiffs to File an Amended Complaint, and Extend Defendants' Time to Answer and in support thereof, state as follows:

1. Plaintiffs **D.C.** and **J.D.M.** ("Plaintiffs") filed a Complaint in this matter on November 17, 2021. (Doc. 1).
2. On or about December 8, 2021, Defendants' Counsel agreed to accept service of the Complaint and Summons on behalf of all Defendants.
3. On December 13, 2021, Waivers of the Service of Summons were filed in this action. (Doc. Nos. 2, 3, 4, and 5).

4. Since filing the original Complaint, Plaintiffs' Counsel has been contacted by several other individuals who have claims against the Defendants like those as outlined in the Complaint.

5. As such, Plaintiffs desire to add parties to this action, and thus amend the caption of this matter, to include *R.M.* and *T.R., a minor, by J.R., Guardian*, as additional plaintiffs. Doing so will streamline this matter for the Court and Parties, who might otherwise be forced to litigate multiple matters arising from essentially the same set of facts.

6. Also, at the request of *J.D.M.*, to remove *J.D.M.* as a Plaintiff, as *J.D.M.* no longer intends to pursue this matter.

7. Pursuant to F.R.C.P. 15, "a party may amend its pleading only with the opposing party's written consent or the court's leave. The court should freely give leave when justice so requires." Here, justice would be served by allowing the amendment.

8. Plaintiffs advised Defendants of the intent to file an Amended Complaint, to which Defendants consent.

9. The anticipated Amended Complaint is why Defendants have delayed filing an Answer to Plaintiffs' first Complaint given the first Complaint will be mooted by Plaintiffs' Amended Complaint.

10. Plaintiffs agree, acknowledge, and understand that Defendants deny the allegations made against them in the Complaint and Amended Complaint and that Defendants reserve all rights, defenses, objections, challenges and the like that may be raised or otherwise directed toward same.

11. Plaintiffs' proposed Amended Complaint is attached hereto as Exhibit A. Plaintiffs request this Court allow Plaintiffs seven (7) days to file the Amended Complaint.

12. Defendants request the Court allow Defendants thirty (30) days from the date Plaintiffs file the Amended Complaint to file a response to the Amended Complaint.

WHEREFORE, the Plaintiffs and Defendants request this Court enter the Parties' proposed Order which permits Plaintiffs to file an Amended Complaint within seven (7) days and gives Defendants thirty (30) days thereafter to respond, and amends the caption to reflect the changes to the parties in this matter.

Dated: February 22, 2022

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Dated: February 22, 2022

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon all Counsel of record through the Court's ECF system on this date.

Dated: February 22, 2022

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